

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK \_\_\_\_\_ X

RITA BAYTSAYEVA

Plaintiff,

v

HONDA LEASE CORPORATION  
MAKSIM SHAPIRO  
SVETLANA ZIS

Defendant(s).

REQUEST TO SUMBIT RECENTLY  
DECIDED SOCIAL SECURITY  
DISABILITY DECISION  
OPPOSITION TO MOTION

09-CV-4874

\_\_\_\_\_ X

Martin Druyan an attorney admitted to practice law before the United States District of New York hereby affirms the truth of the following statements under penalties of perjury:

I am plaintiff's attorney. I request permission to submit the March 3, 2011 decision of the Social Security Administration granting plaintiff disability benefits for the injuries arising out of and as a result of the accident plaintiff complains of against the defendant. Our opposition papers to defendants motion noted that plaintiff pedestrian was seriously injured as the result of being struck by defendants auto and had applied for Social Security Disability benefits.

Wherefore, it is requested that the Court accept the attached decision as a newly obtained exhibit in opposition to defendant motion and that the defendant's motion to dismiss for lack of a §5102(d) NYS Insurance Law serious injury be denied.

Dated: New York, New York  
April 1, 2011



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Served by mail upon Downing & Peck attorneys for defendant at their NYC office by deposit in US mail 4/1/11

Martin Druyan